



*United States Attorney  
Eastern District of New York*

---

*271 Cadman Plaza East  
Brooklyn, New York 11201*

March 18, 2010

Hon. Sandra L. Townes  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: United States v. Juan Carlos Ramirez-Abadia  
Criminal Docket No. 04-1064 (S-3) and 09-772 (SLT)

Dear Judge Townes:

The parties write to request that Your Honor accept the defendant's guilty plea before Magistrate Judge Steven M. Gold on March 1, 2010 in the above cases. We enclose a copy of the plea agreement for your review. We draw your attention to paragraph 14 of the agreement, which provides that if certain conditions are met, then Pursuant to Fed. R. Crim. Proc. 11(c)(1)(C), the parties will recommend to the Court that a specific sentence of 300 months (25 years) incarceration, 5 years of supervised release, a \$200 special assessment (as well as any fines imposed consistent with paragraphs 1 and 2) and the criminal forfeiture set forth in paragraphs 5 through 11 is the appropriate disposition of the case. Upon acceptance of the plea, this recommendation binds the Court.

The parties are available to answer questions the Court may have regarding this matter.

Respectfully submitted,

BENTON J. CAMPBELL  
United States Attorney

By: \_\_\_\_\_  
Carolyn Pokorny  
Assistant U.S. Attorney  
(718) 254-6291

cc: Paul Nalven, Alexi Schacht and David Zapp, Esqs. (counsel to the defendant Ramirez-Abadia)  
Clerk of the Court (SLT)(w/o enclosure)